



136 Elm Street, Hatfield MA 01038

Michael Judge  
Renewable Energy Division Deputy Director  
Massachusetts Department of Energy Resources

Subject: Assurance of Qualification Guideline Comments

Dear Mr. Judge,

Northeast Solar supports the DOER's actions to secure a set-aside for small generation units in Solar Carve out II. As with SREC I the allocations for SREC II have been heavily allocated to development groups wishing only to secure a position while awaiting final financing, development, local approvals and final contracts. Generally the submissions are a speculative action which undermines the program's intent and benefit to the commonwealth.

The DOER's action to secure the set-aside is justified and should be enhanced with the following adjustments to the set-aside provision.

- Expand the small generation set-aside to 240MW
- Increase the small generation set-aside to include systems less than 100kW in size

Although large scale solar development provides some minor economic benefit to the commonwealth through reduced kWh expenses, leases and green jobs, the majority of the incentives and benefits leave the commonwealth. Conversely, the majority of small generation commercial, 25kW – 100kW, are financed locally, owed locally and capture the incentives locally. The return to the commonwealth for expanding both the allocation set-aside and system size will result in a significant increase in capture of the incentives paid solar. In economic terms this would mean a benefit to the commonwealth of 665 million dollars over 20 years (268.8 Million dollars alone in SREC revenues) versus 58 million dollars if the additional 120MW is captured by large third party owned systems. There is no question that creating a set-aside for small generation is a benefit to the commonwealth. Expanding it only enhances the benefit.

Thank you for your consideration in expanding solar benefits to the commonwealth through the expansion of the small generation set-aside. If you have any questions regarding this request, please do not hesitate to contact me.

With kind regards,

Gregory Garrison, President  
Northeast Solar